

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Patricia McLendon,
Plaintiff,
vs.

Richland County,
Defendant.

3:20-cv-01302-MGL-SVH

**PLAINTIFF'S LOCAL RULE 26.03
ADDENDUM TO RULE 26(f) REPORT**

Plaintiff hereby submits the following answers to the Local Rule 26.03 Interrogatories:

1. A short statement of the facts of the case.

ANSWER: Plaintiff is a former employee of Defendant and was terminated to prevent her from taking known forthcoming FMLA leave.

2. The names of fact witnesses likely to be called by the party and a brief summary of their expected testimony.

ANSWER In addition to Plaintiff, who will testify regarding the claims and defenses asserted by the parties in this matter, and medical providers, Plaintiff expects to call Judge Tomothy C. Edmond, Wanda Kelly, Rhudine George and Gloria Edmond. All have knowledge of Plaintiff's FMLA leave and other allegations of the Complaint.

3. The names and subject matter of expert witnesses (if no witnesses have been identified, the subject matter and field of expertise should be given as to experts likely to be offered).

ANSWER None.

4. A summary of the claims or defenses with statutory and/or case citations supporting the same.

ANSWER This case is based upon 29 U.S.C. § 2601, *et seq.* (“the Family and Medical Leave Act.)

5. Absent special instructions from the assigned judge, the parties shall propose dates for the following deadlines listed in Local Civil Rule 16.02:

- a. Exchange of Fed. R. Civ. P. 26(a)(2) expert disclosures; and

ANSWER: Per the scheduling order.

- b. Completion of discovery.

ANSWER: Per the scheduling order.

6. The parties shall inform the Court whether there are any special circumstances which would affect the time frames applied in preparing the scheduling order. *See generally* Local Civil Rule 16.02(C) (Content of Scheduling Order).

ANSWER: The only known special circumstances are the limitations arising from COVID-19.

7. The parties shall provide any additional information requested in the Pre-Scheduling Order (Local Civil Rule 16.01) or otherwise requested by the assigned judge.

ANSWER: None.

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